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*Attorneys for Debtors
and Debtors in Possession*

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the Lead Case,
No. 19-30088 (DM).*

Bankruptcy Case
No. 19-30088 (DM)

Chapter 11
(Lead Case)
(Jointly Administered)

**DECLARATION OF THEODORE E.
TSEKERIDES IN SUPPORT OF D&O
INSURANCE MOTION**

Date: July 9, 2019
Time: 9:30 a.m. (Pacific Time)
Place: United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102

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2 I, Theodore E. Tsekerides, pursuant to section 1746 of title 28 of the United States Code,
3 hereby declare under penalty of perjury that the following is true and correct to the best of my
4 knowledge, information, and belief:

5 1. I am a partner at Weil, Gotshal & Manges LLP, counsel to Pacific Gas and Electric
6 Company and PG&E Corporation (collectively, the “**Debtors**”) in the above-captioned Chapter 11
7 Cases.

8 2. Except as otherwise indicated herein, the facts set forth in this Declaration are based
9 upon my personal knowledge, my review of relevant documents, and information provided to me
10 by the Debtors’ employees or the Debtors’ legal, restructuring, and financial advisors. If called
11 upon to testify, I would testify competently to the facts set forth in this Declaration. I am authorized
12 to submit this Declaration on behalf of the Debtors.

13 3. This Declaration is submitted in support of the *Motion Pursuant to 11 U.S.C. §§*
14 *105(a) and 363(b) and Fed. R. Bankr. P. 2002 and 6004(h) Authorizing Debtors to Purchase*
15 *Directors and Officers Insurance* and the *Debtors’ Reply in Support of the D&O Insurance Motion*
16 *and Response to Objection of the Official Committee of Unsecured Creditors* (the “**Reply**”).
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1 4. Attached hereto as **Exhibit A** are true and correct excerpts, with certain confidential
2 information not relevant to the Reply redacted, from the July 3, 2019 deposition transcript of
3 Janaize M. Markland.
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9 *[Remainder of page intentionally left blank]*
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1 Pursuant to 28 U.S.C. § 1746, I declare under the penalty of perjury, that the foregoing
2 is true and correct to the best of my knowledge, information, and belief, and that this declaration was
3 executed at New York, New York on July 8, 2019.
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8 Theodore E. Tsekerides
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